

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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VOTORANTIM CIMENTOS LTDA,

Petitioner,

-VS-

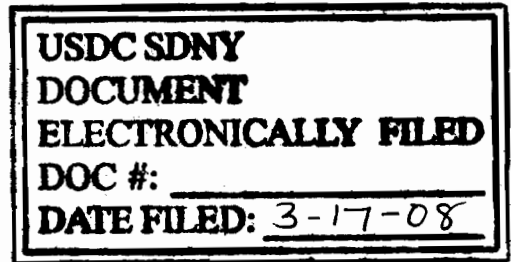
OXBOW CARBON AND MINERALS LLC,  
SUCCESSOR IN INTEREST BY MERGER  
TO APPLIED INDUSTRIAL MATERIALS  
CORPORATION,

Respondent.

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08 CV 02232 LBS

**STIPULATION AND ORDER**



WHEREAS, Votorantim Cimentos LTDA (“Votorantim”) and Applied Industrial Materials Corporation, which has since been succeeded in interest by Oxbow Carbon & Minerals LLC (“Oxbow”), undertook an arbitration that resulted in a Final Award, dated February 29, 2008 (the “Final Award”); and

WHEREAS, Votorantim has filed a petition to confirm the Final Award, dated March 6, 2008; and

WHEREAS, Oxbow desires to move the Court to Vacate the Final Award;

NOW THEREFORE, the parties in this action, by their undersigned attorneys, hereby stipulate to the following:

1. Oxbow shall serve its notice of motion to vacate the Final Award and its memorandum of law in support thereof on or before May 23, 2008, and the undersigned attorneys of Votorantim agree to accept service of such notice of motion and memorandum of law on behalf of Votorantim.

2. Votorantim shall serve its opposition papers to such motion on or before June 27, 2008.

3. Oxbow shall serve its reply papers on such motion on or before July 18, 2008.

Paul, Hastings, Janofsky & Walker LLP

Chalos, O'Connor & Duffy, LLP

Attorneys for Respondent  
*Oxbow Carbon & Minerals LLC*

Attorneys for Petitioner  
*Votorantim Cimentos LTDA*

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Daniel B. Goldman (DG-4503)

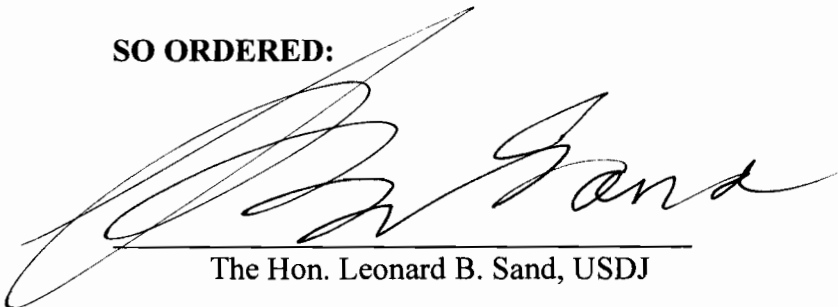
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**SO ORDERED:**

New York, NY  
3/17, 2008

  
The Hon. Leonard B. Sand, USDJ